

**IN THE UNITED STATES DISTRICT COURT  
FOR THE NORTHERN DISTRICT OF IOWA  
CEDAR RAPIDS DIVISION**

PARENTS DEFENDING EDUCATION,

*Plaintiff,*

v.

LINN-MAR COMMUNITY SCHOOL  
DISTRICT; *et al.*,

*Defendants.*

Case No. 22-cv-78-CJW-MAR

**DECLARATION OF NICOLE NEILY**

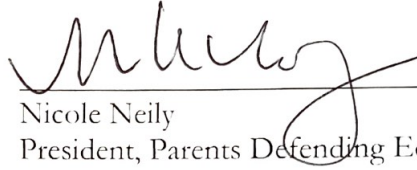
1. I am the President of Parents Defending Education (“PDE”).
2. I am over the age of eighteen and under no mental disability or impairment. I have personal knowledge of the following facts and, if called as a witness, would competently testify to them.
3. PDE is a nationwide, grassroots membership organization whose members are primarily parents of school-aged children. PDE has members throughout the country.
4. PDE’s mission is to prevent the politicization of K-12 education, including government attempts to usurp parents’ rights and to silence students who express opposing views. PDE seeks to stop indoctrination in the classroom and promote the restoration of a healthy, non-political education for kids.
5. PDE furthers its mission through network and coalition building; investigative reporting; engagement on local, state, and national policies; disclosure of harmful local and national school policies to PDE’s members and other parents; advocacy; and, if necessary, litigation.
6. PDE has members who are harmed by Policy 504.13-R, including Parents A-G.

7. I am personally familiar with and have spoken to the PDE members who are mentioned in the complaint (Parents A-G) and whose declarations are provided with this motion. I am also personally familiar with and have spoken to other PDE members who have children enrolled in Linn-Mar schools who are also harmed by the Policy but are not mentioned in the complaint.

8. PDE brought this suit to protect the constitutional rights of PDE's members, their children, and other parents and students within the Linn-Mar school district.

Per 28 U.S.C. §1746, I declare under penalty of perjury that the foregoing is true and correct to the best of my knowledge.

Executed on August 5, 2022.



Nicole Neily  
President, Parents Defending Education